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Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street S.W. Washington, D.C. 20554

Re: CC Docket 94-102

**Enhanced 911 Tier III Interim Report** 

Tennessee RSA No. 3 Limited Partnership d/b/a Eloqui Wireless

Dear Ms. Dortch:

On behalf of the above-referenced carrier there is transmitted herewith a narrative statement regarding the company's E-911 deployment and implementation status. The filer is a Tier III carrier submitting its Interim Report in accordance with the provisions of the Commission's Order in Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket 94-102, Order To Stay (rel. July 26, 2002) and the subsequent FCC Public Notice released June 30, 2003, DA 03-2113.

If questions arise with regard to this filing, please contact the undersigned.

Very truly yours,

PAmul L List

Pamela L. Gist

# Tennessee RSA No. 3 Limited Partnership d/b/a Eloqui Wireless

#### Interim Report of the Status of Enhanced 911 Phase II Compliance

Tennessee RSA No. 3 d/b/a Eloqui Wireless has made significant steps in implementing our network-based Phase II E911 services, having chosen a network-based technology for implementation of Phase II services. The Tennessee Emergency Communications Board, who represents the State Department of Commerce and Insurance, is responsible for coordination of most E911 activities between carriers and PSAPs in the State of Tennessee. Pursuant to an earlier request, we provide Phase I service to approximately 87% of the PSAPs within our cellular geographic service area. We will timely provide Phase I services when additional counties request and are ready for Phase I services from us.

In August 2002 we received a valid PSAP request from the State of Tennessee for Phase II Deployment, with a deployment date of September 1, 2003. We feel we can meet that date but have been delayed in our process by funding complications and storm damage.

The State of TN 911 board requested implementation of Phase II services through 100% of our market. With this request they approved our cost recovery plan to fund 100% of our hardware needs and promised a quick delivery of funds. The two week guarantee of funding turned into five months of red tape. With the uncertainty of funding, the equipment we ordered to comply with 100% implementation had to be returned. Without the promised funding, we could only fund the equipment needed in half of our market and have gone forward with installation. As hopes have been raised for receiving our promised funding, we have prepared to receive and install equipment for the other half of the market. This uncertainty of funding has caused us delays because the design mapping of our market has been changed multiple times. If funding was not promised for 100% of our market, we would not have chosen such an aggressive plan and would have only planned implementation in 50% of our market.

To date, funding has been the major obstacle in completing our Phase II E911. We have struggled with allotting the appropriate engineering time to complete this project but are hopeful this will not cause us a delay. We do anticipate complications in receiving funding for the engineering time spent to complete this project. Recently we have experienced lightning damage to our system that directly affected our 911 equipment.

Tennessee RSA No. 3 anticipates Phase II services deployed in at least 50% of our market by September 1<sup>st</sup> and the remainder of our market shortly thereafter. As installation is completed and testing begins, we will be better able to assess our ability to meet the required date.

Please contact Gary Masters, 865-691-1555, if you have any questions or need any additional information.

## AFFIDAVIT

County of Knox		
	)	
State of <u>Tennessee</u>	)	SS

- I, John Miller, having been first duly sworn, depose and state as follows:
- 1. I am CEO for TN RSA No. 3 d/b/a Eloqui Wireless
- I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

John Miller

CEO

Eloqui Wireless

Subscribed to and sworn to before me

This <u>30</u> day of <u>July</u>, 2003.

Notary Public

My commission expires: August 5, 2003

#### CERTIFICATE OF SERVICE

I, Daniel Ladmirault, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1<sup>st</sup> day of August, 2003, sent by hand-delivery, a copy of the foregoing Enhanced 911 Tier III Interim Report of Tennessee RSA No. 3 Limited Partnership d/b/a Eloqui Wireless to the following:

John Muleta, Chief\*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

David Solomon, Chief\* Enforcement Bureau Federal Communications Commission 445 12th Street, S.W., Room 7-C723 Washington, D.C. 20554

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John Ramsey, Executive Director APCO International, Inc. World Headquarters 351 N. Williamson Blvd. Daytona Beach, FL 32114-1112

Jim Goerke, Interim Executive Director NENA 422 Beecher Rd. Columbus, OH 43230

Evelyn Bailey, Executive Director, NASNA Vermont Enhanced 9-1-1 Board 94 State Street Drawer 20 Montpelier, VT 05620-6501

\*via hand-delivery